

**KRONENBERGER ROSENFELD, LLP**

Karl S. Kronenberger (Bar No. 226112)
Jeffrey M. Rosenfeld (Bar No. 222187)
Virginia A. Sanderson (Bar No. 240241)
150 Post Street, Suite 520
San Francisco, CA 94108
Telephone: (415) 955-1155
Facsimile: (415) 955-1158
karl@KRInternetLaw.com
jeff@KRInternetLaw.com
ginny@KRInternetLaw.com

Attorneys for Third-Party Defendant Ryan
Lenahan and for Specially Appearing
Third-Party Defendant Kyle Danna

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DAVID TRINDADE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

REACH MEDIA GROUP, LLC, a
Delaware limited liability company,

Defendant,

REACH MEDIA GROUP, LLC, a
Delaware limited liability company,

Third-Party Plaintiff,

v.

RYAN LENAHAn, an individual, **KYLE
DANNA**, an individual, and **EAGLE WEB
ASSETS INC.**, a corporation,

Third-Party Defendants.

Case No. 5:12-cv-04759 (PSG)

**DECLARATION OF JEFFREY M.
ROSENFELD IN SUPPORT OF
THIRD-PARTY DEFENDANT RYAN
LENAHAN'S MOTION TO STRIKE
CLAIMS UNDER CAL. CODE OF CIV.
PROC. 425.16 (ANTI-SLAPP
MOTION)**

DATE: February 26, 2013

TIME: 10:00 a.m.

CTRM: 5, 4th Floor

JUDGE: The Hon. Paul S. Grewal



1 I, Jeffrey M. Rosenfeld, declare as follows:

2 1. I am an attorney admitted to practice in the State of California and before
3 this Court. I am a partner at the law firm of Kronenberger Rosenfeld, LLP, counsel of
4 record for Third-Party Defendants Ryan Lenahan and Kyle Danna. Unless otherwise
5 stated, I have personal knowledge of the matters stated herein.

6 2. Facebook is a social networking website, which allows users to form
7 groups. Access to Facebook groups can be limited to members of the group or can be
8 open to any user of Facebook.

9 3. On January 16 and January 18, 2013 I visited the Facebook group named,
10 "Internet Advertising—People Who Don't Pay," and located at
11 <www.facebook.com/groups/internetdeadbeats> (the "Facebook Group"). I accessed the
12 Facebook Group using Kronenberger Rosenfeld, LLP's Facebook account.

13 4. I was able to access the Facebook Group and view the materials posted on
14 the Facebook Group without becoming a member of the Facebook Group.

15 5. The materials posted on the Facebook Group included but were not limited
16 to: a) hundreds—if not thousands—of comments posted to the Facebook Group, b) a list
17 of the 2,244 members of the Facebook Group and links to their Facebook profiles, and c)
18 an "About" section describing the Facebook Group.

19 6. Attached hereto as **Exhibit A** is a true and correct printout of a screenshot
20 of the "About" section of the Facebook Group, which reflects that the Facebook Group
21 has 2,244 members. I downloaded this screenshot on January 16, 2013 from the
22 Facebook Group using the Google Screen Capture extension in connection with the
23 Google Chrome web browser.

24 7. Attached hereto as **Exhibit B** is a true and correct printout of a screenshot
25 of the portion of the Facebook Page that displays the statements at issue in the lawsuit,
26 and the comments provided by others in response. I downloaded this screenshot on
27 January 18, 2013 from the Facebook Group using the Google Screen Capture extension
28 in connection with the Google Chrome web browser.

